

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CHECKPOINT SYSTEMS, INC,) CASE NO. 5:11-cv-01199-SL
)
Plaintiff,) JUDGE SARA LIOI
)
v.) MAG. JUDGE GEORGE J. LIMBERT
)
HANGZHOU CENTURY CO., LTD, et al.,) UNIVERSAL SURVEILLANCE
) CORPORATION'S REPLY TO
) COUNTERCLAIMS OF PLAINTIFF
Defendants.) (DEMAND FOR JURY TRIAL)

For its reply to the Counterclaims of Plaintiff Checkpoint Systems, Inc., ("Checkpoint")` Defendant/Counterclaim Plaintiff Universal Surveillance Corporation ("USS") hereby states and avers as follows:

FIRST DEFENSE

1. The Counterclaims fail to state a claim upon which relief can be granted.
2. USS admits the averments contained in paragraphs 1, 2, 3, 4, 5, 6, 7 and 8 of the Counterclaims.
3. USS denies the averments in paragraphs 9, 10 and 11 of the Counterclaims.
4. As to paragraph 12 of the Counterclaims, USS repeats and realleges its averments with respect to paragraphs 1-11 of the Counterclaims.
5. USS admits the averments in paragraph 13 of the Counterclaims.
6. USS denies the averments in paragraph 14 of the Counterclaims.
7. As to paragraph 15 of the Counterclaims, USS repeats and realleges its averments with respect to paragraphs 1-14 of the Counterclaims.
8. USS admits the averments of paragraph 16 of the Counterclaims.

9. USS denies the averments of paragraphs 17, 18 and 19 of the Counterclaims.
10. As to paragraph 20 of the Counterclaims, USS repeats and realleges its averments with respect to paragraphs 1-19 of the Counterclaims.
11. USS admits the averments of paragraph 21 of the Counterclaims.
12. USS denies the averments of paragraph 22 of the Counterclaims.

PRAYER FOR RELIEF

WHEREFORE, USS requests the following relief:

- a) Dismissing Checkpoint's Counterclaims, with prejudice, and denying any claim for relief prayed for therein;
- b) Judgment that Checkpoint infringes, directly or indirectly, U.S. Patent Nos. 7,969,310 ("the '310 patent") and U.S. Patent No. 7,342,495 ("the '495 patent");
- c) Judgment that claims of the '310 and '495 patents are not invalid;
- d) An award of damages to USS to compensate for Checkpoint's infringement of the '310 and '495 patents;
- e) A permanent injunction enjoining Checkpoint from continuing to infringe the '310 and '495 patents;
- f) Judgment that this is an exceptional case and an award of attorneys' fees and costs to USS pursuant to 35 U.S.C. § 285; and
- g) Such other relief as the Court deems appropriate.

Respectfully submitted,

/s/ Kip T. Bollin

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JURY DEMAND

USS demands a trial by jury on all issues so triable.

/s/ Kip T. Bollin

Kip T. Bollin (0065275)

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was filed on September 21, 2012 via the Court's electronic filing system. Parties may access the filing through the Court's electronically.

/s/ Kip T. Bollin

One of the attorneys for Defendant Universal
Surveillance Corporation